

UNITED STATES DISTRICT COURT  
THIRD DIVISION  
DISTRICT OF MINNESOTA

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Nancy J. Nicholson,

Court File No. \_\_\_\_\_

Plaintiff,

**NOTICE FOR REMOVAL**

vs

Walgreen Co.,

Defendants.

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TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MINNESOTA:

Petitioner\Defendant respectfully shows and alleges the following in support of its  
Petition for Removal.

1. Petitioner is the Defendant in an action commenced against them in Ramsey  
County District Court entitled Nancy J. Nicholson v. Walgreen Co. A true and correct  
copy of the Summons and Complaint served upon petitioner is attached as Exhibit "A".  
No further proceedings have taken place in the state action.

2. Plaintiff, Nancy J. Nicholson, is and was at all relevant times a citizen of the  
County of Ramsey and State of Minnesota. Petitioner\Defendant Walgreen Co. is and  
at all relevant times a corporation with its principal place of business in the State of  
Illinois.

3. Complete diversity exists among the parties to this action and the amount in  
controversy exceeds the sum of \$75,000, exclusive of interest and costs.

4. Based upon the foregoing, this Court has original jurisdiction for this matter pursuant to 28 U.S.C. § 1332, and the entire matter is one which may be removed to this Court pursuant to 28 U.S.C. § 1441.

5. The Summons and Complaint in the state action was served on Defendant on or about November 24, 2008, and Petitioner\Defendant has filed this Notice to Remove within thirty (30) days after service of the Summons and Complaint.

WHEREFORE, Petitioner\Defendant pray that the state action pending against them be removed to this Court.

Dated: December 8, 2008.

Lind, Jensen, Sullivan & Peterson  
A Professional Association

s\ Brian A. Wood

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